

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

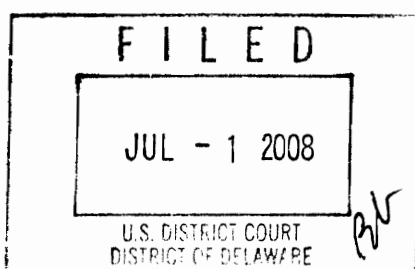
Jimmie Lewis

v.

CA NO. 06-778 (GMS)

THOMAS L. CARROLL, ET AL

MOTION FOR PRELIMINARY INJUNCTION
3; PURSUANT TO FED R. CIV P# 65



DATE: 6/25/08

Jimmie Lewis
Jimmie Lewis
SBI # 506622
D.C.C.
1181 PADDOCK RD
SMYRNA, DE 19977

P.I) at or about 12:00 pm at the D.C.C

P.I)

on April 30, 08 Warden Phelps, Staff LT Karen Hawkins and several D.O.C officials toured SHU 18, for what appeared to be a tour of execution, so everyone thought, due to SHU 18 housing death row inmates. But to everyone's surprise, the tour was extended to SHU 17 (A) unit from about 1:00 pm, until 1:30 pm.

P.II.) The same day on April 30, at about 7:00 pm while I was in SHU 17 (A) L 1, % Tilgman gave me legal mail, for which omitted toxic fumes, that in minutes thereafter caused me to feel symptoms of light headedness, nauseated, drowsy, throbbing headache, blurry vision, and blood shot red eyes.

P.III) On April 30, 08 at about 8:30 pm LT. Peter Forbes had numerous (10) officers respond to SHU 17 (A) unit only, even though there were no alarms sounding off, no electrical outages or any other specific reason for said staff-members to wear gas masks as they entered SHU 17 (A) unit.

P.2)

P.IV) As the responding staff members entered SHU 17 (A) unit; They payed particular close attention to my assigned cell, SHU 17 (A) L1, (To see if I had been overwhelmed by the pharmaceutical drugs Sodium thiopenthal (the anesthetic), Pancuronium Bromide (the paralyzing agent), and Potassium Chloride (the drug that actually caused death by heart attack.). At this time I request from LT. Peter Forbes that I be allowed to ~~be~~ be checked by a nurse, but LT Peter Forbes refused to adhere to my verbal request, even after I explained the aforementioned symptoms to him!

P.V) At or about 5:00 Am May 1, 08 the Nurse did medication pass on SHU 17 (A) unit, and at that time I informed Sgt Jack Evans of my aforementioned symptoms, but Sgt Jack Evans did not allow the nurse to stop at my assigned cell SHU 17 (A) L1, to check my vitals.

VII less than one hour Sgt Jack Evans (P3) and Gp Tilgman came onto the SHU 17 (A) unit to serve breakfast; minutes after I ate the breakfast that Sgt Jack Evans served me personally; my heart began to hurt in a very painful manner; in conjunction with the aforementioned symptoms, I was in a dire state of near death!

VIII.) As soon as possible the next shift; because after breakfast, the 12 to 8 shift did not re enter the unit, I informed Gp Turner and Sgt K. Travis of my dilemma. I was thereafter informed that nurse Betty Bryant was notified but didn't respond. At or about 11:45 AM May 1, 08 I informed CPL K. ~~Burley~~ Burley; Gp Turner and Sgt K. Travis that I was in serious need of a nurse, and that I wanted to speak with Staff LT. K. Hawkins and a mental health clinician.

IX.) CPL K. Burley; Sgt K. Travis and Gp Turner shackled & handcuffed me, and placed me into SHU 17 (A) unit's interview room. After a brief comprehensive interview, clinician Queeny contacted Dr Cannelli and I was classified for a higher level of observation.

P.T. 1200 than ten minutes thereafter,
 I collapsed due to the aforementioned
 symptoms of light headedness, ~~and~~ not
 being able to breathe, blurry vision,
 blood shot red eyes, nausea, ~~and~~
 and severe heart pain. ~~the officers could not locate a pulse and or~~
 the officers could not locate a pulse and or
 any heart activity. Moments later, I revived
 and both C/O Turner and Nurse Betty Bryant whom
 had finally arrived after numerous ~~and~~ calls,
 observed that my heart rate was extremely
 elevated, and ~~the oxygen in~~ the oxygen in
 my blood was extremely low. I was there
 after transferred to the D.C.C infirmary.

P.T. I was admitted into the D.C.C infirmary
 with a blood pressure reading 210/110 enough
 to cause stroke; and blood oxygen level of 96%
 for which indicates that my oxygen in my blood
 was flowing properly. My blood pressure has never
 been as high as 210/110, nor has my blood oxygen
 level ever been 96%. During the course of
 my stay in the D.C.C infirmary May 1, 08 thru -
 May 22, 08 Dr Kimberly Watson psychologist
 documented my claims, as well as the nursing
 staff and other medical staff members.

p. 5.1

for cholesterol, enzymes, etc.

~~Don't forget to check the box for the correct answer.~~
~~Don't forget to check the box for the correct answer.~~

~~infirmaries~~ under 24 hour illumination, no outside recreation, and unable to respond to legal notices, or use the telephone unlike other infirmary inmates.

PRILL) On May 22, 08 at about 2:30 PM P.6.)

LT. Godwin, 1/0 Jelliffe 1/0 Mills and at least five D.C.C. correctional officers came to my assigned cell, INT D 191. I was under the impression that, they were intending to take me to execute me. LT. Godwin sprayed me with capstan and I exited cell D 191 in a security anti-suicide gown, and thereafter I was taken to SHU 17 and placed in handcuffs and shackles with blackbox, and put into the SHU 17 barber shop for 24 hours, for which Nurse Cellina helped security put me in restraints, i.e., the tube, patient no. 5.551.086 made in USA, for which caused me tremendous pain and suffering due to said shackles and handcuffs ~~on~~ cutting into my tissue, muscles, nerves, bones and causing me edema. The effects of the capstan, not being able to breathe - burning skin and eyes persisted for at least three days, and the effects of the shackles and handcuffs with blackbox persisted for at least two weeks. This was also done to inmate Thomas Gordon, who was transferred from the D.C.C. infirmary, to SHU 19, barber shop. ("This occurred from 5:00 PM May 22, 08 thru 5:00 PM May 23, 08; i.e. The barber shop incident").

PXIV) Furthermore, on May 23, 08 at 5:00 pm
I was placed into SITU 17 CUH, and on

May 29, 08 at or about 9:00 Am my assigned cell door was opened in order to allow another inmate into my assigned cell to do me physical harm.

I was given a disciplinary code violation, for exiting my assigned cell and requesting to speak with the housing unit's LT; due to my protective custody status being in jeopardy; I was not provided with the disciplinary report, for which I made LT. Larry Savage fully aware of, but he still gave me sanction; nor was I allowed to appeal.

P XL) On June 18, 08 ~~XXXXXXXXXXXXXXXXXXXX~~
Numerous D.O.C officials conducted another tour
of SHU 17, Thereafter ~~later~~ during the early
morning of June 19, 08 at or about 5:30 Am
Agt Jack Evans and % Tilgman came onto
SHU 17 (C) unit to serve breakfast; Agt Jack Evans
again served me breakfast that minutes later
caused my heart to hurt in a very painfull
manner; light headedness; nauseated, Throbing headache,
blurry vision, blood shot red eyes; etc.
I am treated as a I.S.D.P; inmate sentence
to death penalty

(P. 8)

~~P. 8~~) Subsequently, on June 19, 08 while I was in the shower on SHU 17 (C) unit, the shower door was opened by PO Tilgman at or about 6:00 pm, along with SHU 17 CL3 & CL4. I exited the shower and immediately requested Sgt L. David to contact the housing LT. LT. Burmann and LT Sessions responded to SHU 17 (C) unit along with "O.R.T." Quick Response Team. I was escorted to my assigned cell SHU 17 C411, where I gave LT Sessions a notation regarding my dilemma with Sgt Jack Evans and PO Tilgman that were also forwarded to DCC Warden Phelps.

See notation to D.C.C. Warden Phelps.
Grievance #'s 158374, 158378, 158379, 158376, 160192, 160630, 160287, 160628, 157145, 160547, 160190 as well as all other grievance I filed since May 1, 08 up to date.

See also; disciplinary report # 1041130, 1041302, and 1041107. This is being done to me because I filed civil action complaint NO's 04-1350 GMS, 05-013 GMS, and 06-778 GMS. Violation of my rights under 11 DEC C; 6502, 6504, 6517, 6524, 6525, 6531, ~~6536~~ 6536 Violation of my rights under the 1ST, 8TH AND 14TH U.S.C.A. RIGHTS.

P. 9.)

PXVII)

Furthermore, I realize that I am represented by counsel; i.e., J. Cory Fatgowski and Katherine V. Jackson; but the defendants refuse to allow them to enter the D.C.C. for our initial interview and conference, after waiting three weeks to do so, dating June 3, 08 thru June 24, 08.

PXVIII) I aforementioned gives reason why I filed this 3rd motion for preliminary injunction pro-se. It seems to me that the defendants need more time to try and successfully administer the lethal drugs to me; before my appointed counsel can legally interview. See attached memo as exhibit.

Violation of my 1st USCA Right.

P. 10)

P. 10)

Being distraught about being given the pharmaceutical drugs, I have wrote notations and filed grievances, while continuously seeking more tangible answers on 6/25/08 nurse Betty Bryant stopped at my assigned cell 5.HU17, call during her med pass and passed me what I first thought to be a sick call request slip, for which it was, but it contained a message that stated, Quote. at first I thought you were lying, but I ones heard a few officers say that the lethal injection mixture doesn't work the same in food, if we give him too much, I know it will be detected; Fuck him, he's a snitch ass homosexual pedophile anyway! Who? Dimmie Lewis, ~~unquote~~. So for your information here are the names of the drugs that to the I. S. D. P, inmates sentenced to death penalty. Sodium thiopenthal, (the anesthetic), Pancuronium Bromide, (the paralyzing agent) and potassium Chloride, (the drug that actually causes death, unquote.

• RELIEF sought:

- 1) a Toxicology examination of my blood, to check for the presence of Sodium thioenthal (the anesthetic); Pancuronium Bromide (the paralyzing agent), Potassium Chloride (the drug that caused death); and or any other toxic chemical or pharmaceutical drug.
- 2) To be transferred to a facility out side the reach and or influence of the defendants.
- 3) For the Honorable court to enact whatever condition it deems necessary and or that is applicable.

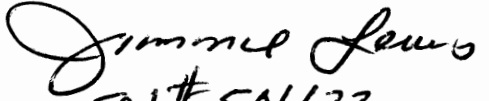
CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DOE HEREBY CERTIFY ON THIS 25TH DAY OF JUNE,
2008; THAT I DID MAIL ONE TRUE AND CORRECT
COPY OF THE MOTION FOR PRELIMINARY INJUNCTION
3, PURSUANT TO FED R. CIV P# 65; TO EACH OF
THE FOLLOWING :

THE CLERK OF THE COURT (GMS)
U.S DISTRICT COURT
844 N. KING ST; LOCKBOX 18
WILMINGTON, DE 19801

ERIKA Y. TROBS
DEPT OF JUSTICE
CIVIL DIVISION
820 N. FRENCH ST
6TH FL
WILM, DE 19801

DATE: 6/25/08

JIMMIE LEWIS

SB# 506622
D.C.C
1181 PADDOCK RD
SMYRNA, DE 19977

DCC Delaware Correctional Center
 Smyrna Landing Road
 SMYRNA DE, 19977
 Phone No. 302-653-9261

Date: 06/10/2008

GRIEVANCE REPORT

OFFENDER GRIEVANCE INFORMATION

Offender Name : LEWIS, JIMMY	SBI# : 00506622	Institution : DCC
Grievance # : 160630	Grievance Date : 05/30/2008	Category : Individual
Status : Non Grievable	Resolution Status :	Resol. Date :
Grievance Type: Hygiene/Sanitation	Incident Date : 05/29/2008	Incident Time :
IGC : Dutton, Matthew	Housing Location : Bldg 17, Upper, Tier C, Cell 11, Single	

OFFENDER GRIEVANCE DETAILS

Description of Complaint: The soap that is know being utilized by DCC does not have any manufactured distribution label identification stamped on it, contains chemicals that are toxic and does a immediate danger to my circulatory, nervous, respiratory and reproductive systems due to said toxins in conjunction slowly deteriorating my aforementioned systems. Inmates housed on SHU 17 C unit all agree, that the soap smells like chemicals.

Remedy Requested : For this matter to be investigated, to be provided with the manufacture of the soap who is responsible for purchasing the soap, and for the soap to be changed to a different brand that is not toxic.

INDIVIDUALS INVOLVED

Type	SBI #	Name

ADDITIONAL GRIEVANCE INFORMATION

Medical Grievance : NO	Date Received by Medical Unit :
Investigation Sent :	Investigation Sent To :
Grievance Amount :	

DCC Delaware County Correctional Center
 800 W. 1st St.
 Dover, DE 19901
 Phone No. 302.739.1234

Date: 06/12/2008

GRIEVANCE REPORT

OFFENDER COMPLAINT INFORMATION

Offender Name : LEWIS, JIMMY SBI# : 0506622 Institution : DCC
 Grievance # : 160287 Grievance Date : 06/21/2008 Category : Individual
 Status : Withdrawn Resol. Date :
 Grievance Type: Health Issue (Medical) Incident Time :
 IGC : Dutton, Matthew 17, Upper, Tier C, Cell 11, Single

OFFENDER COMPLAINT DETAILS

Description of Complaint: Inmate claims: Being housed in cell with 24 hrs illumination, no outside recreation and not being provided apon r... ce or denied the opportunity to send legal correspondences while being housed in cell. Infirmity violates my 1st USCA right.

Remedy Requested : For this matter to be investigated for abuse - neglect and mistreatment of my rights under 11 Dec C 6502, 6504, 6536, 652... and 14th USCA rights.

INDIVIDUALS INVOLVED

Type	SBI #

ADDITIONAL INFORMATION

Medical Grievance : YES

Medical Unit : 06/04/2008

Investigation Sent : 06/04/2008

: Moore, Ronnie

Grievance Amount :

DCC Delaware Correctional Center
 Smyrna Landing Road
 SMYRNA DE, 19977
 Phone No. 302-653-9261

Date: 06/10/2008

GRIEVANCE REPORT

OFFENDER GRIEVANCE INFORMATION

Offender Name : LEWIS, JIMMY	SBI# : 00506622	Institution : DCC
Grievance # : 160628	Grievance Date : 05/30/2008	Category : Individual
Status : Non Grievable	Resolution Status :	Resol. Date :
Grievance Type : Disciplinary	Incident Date : 05/21/2008	Incident Time :
IGC : Dutton, Matthew	Housing Location : Bldg 17, Upper, Tier C, Cell 11, Single	

OFFENDER GRIEVANCE DETAILS

Description of Complaint: During my admission in the infirmary while prescribed to be on psych close observation level 2, for which prohibits any sharp items such as pens, sporks, razors etc, I was wrote up by C/O Clinton Gillis Dr #1041107, for ripping half of the outer lining out of a safety suicide gown, for which is designed to prevent ripping in order to protect from suicide attempts, that is, if the suicide gowns aren't suicide proof?

Remedy Requested : For this matter to be investigated to determine exactly how I was, able to do the aforementioned damage to a suicide gown while on psych close observation level 2 security watch?

INDIVIDUALS INVOLVED

Type	SBI #	Name

ADDITIONAL GRIEVANCE INFORMATION

Medical Grievance : NO	Date Received by Medical Unit :
Investigation Sent :	Investigation Sent To :
Grievance Amount :	

DCC Delaware Correctional Center
 Smyrna Landing Road
 SMYRNA DE, 19977
 Phone No. 302-653-9261

Date: 06/10/2008

GRIEVANCE REPORT

OFFENDER GRIEVANCE INFORMATION

Offender Name : LEWIS, JIMMY	SBI# : 00506622	Institution : DCC
Grievance # : 157145	Grievance Date : 04/22/2008	Category : Individual
Status : Withdrawn	Resolution Status :	Resol. Date :
Grievance Type: Telephone	Incident Date : 04/10/2008	Incident Time :
IGC : Dutton, Matthew	Housing Location : Bldg 17, Upper, Tier C, Cell 11, Single	

OFFENDER GRIEVANCE DETAILS

Description of Complaint: Inmate Claims: It is the DCC SOP for inmates to fill out a legal telephone call request SOP, form #883 in order to be allowed to make legal telephone calls. The dilemma is that I fill out form #883 on numerous occasions, but I'm never allowed to utilize the phone to call my attorney's Michelle Nardozi, John Sedinger or Coughry and Lindsey LLC. I am denied legal telephone calls, unlike other inmates.

Remedy Requested : To be provided with who is responsible for my being denied legal phone calls, why, and what I need to do to ensure that I have proper access to my attorneys via telephone.

INDIVIDUALS INVOLVED

Type	SBI #	Name

ADDITIONAL GRIEVANCE INFORMATION

Medical Grievance : NO	Date Received by Medical Unit :
Investigation Sent :	Investigation Sent To : Hawkins, Karen D
Grievance Amount :	

DCC Delaware Correctional Center
 Smyrna Landing Road
 SMYRNA DE, 19977
 Phone No. 302-653-9261

Date: 06/09/2008

GRIEVANCE REPORT

OFFENDER GRIEVANCE INFORMATION

Offender Name : LEWIS, JIMMY	SBI# : 00506622	Institution : DCC
Grievance # : 160547	Grievance Date : 05/21/2008	Category : Individual
Status : Non Grievable	Resolution Status :	Resol. Date :
Grievance Type: Classification	Incident Date : 05/21/2008	Incident Time :
IGC : Dutton, Matthew	Housing Location : Bldg 17, Upper, Tier C, Cell 11, Single	

OFFENDER GRIEVANCE DETAILS

Description of Complaint: Inmate claims: The 13th U.S.C.A has granted my custodians the legal authority to hold me captive under Delaware Law here at DCC, without the ability to grieve my classification status, my classification to the SHU, Disciplinary reports and procedures, for which has denied me my well established liberty interest right to rehabilitative treatment and or therapy or job training through out the course of my incarceration, for which has lead me down the path of the inevitable, i.e., habitual recedivism.

Remedy Requested : For this matter to be investigated for abuse, neglect - mistreatment in violation of my 1st, 4th, 6th, 8th and 14th usca rights as well as my rights under 11 DEL C 6502, 6504, 6517, 6525, 6536, 6524, 6535

INDIVIDUALS INVOLVED

Type	SBI #	Name

ADDITIONAL GRIEVANCE INFORMATION

Medical Grievance : NO	Date Received by Medical Unit :
Investigation Sent :	Investigation Sent To :
Grievance Amount :	

DCC Prisoner Complaint Center

Date: 06/12/2008

GRIEVANCE

OFFENDER INFORMATION

Offender Name : LEWIS, JIMMY SBI # : 1622 Institution : DCC
 Grievance # : 160190 Grievance Date : 05/11/2008 Category : Individual
 Status : Withdrawn Resol. Date :
 Grievance Type: Medical Staff Incident Time : 17:00
 IGC : Dutton, Matthew 17, Upper, Tier C, Cell 11, Single

OFFENSE INFORMATION

Description of Complaint: Inmate Claims: See me in handcuffs and shackles with black box inside the SHU 17 bay. I was told to follow Cellina's instruction to do so for 24 hours. This was done to inflict pain on me for no medical reason. Nurse Celina even helped secure the restraints on me. I was told 5.551.086 made in USA. Why was this done to me, said restraints hurt my back, muscles, nerves, bones, and caused me Edema.

Remedy Requested : For this matter to be investigated and mistreatment in violation of 11 DEL C 6502, 6504, 6517, 6536, 6508, 6510, 6511, 6512, 6513, 6514, 6515, 6516, 6517, 6518, 6519, 6520, 6521, 6522, 6523, 6524, 6525, 6526, 6527, 6528, 6529, 6530, 6531, 6532, 6533, 6534, 6535, 6536, 6537, 6538, 6539, 6540, 6541, 6542, 6543, 6544, 6545, 6546, 6547, 6548, 6549, 6550, 6551, 6552, 6553, 6554, 6555, 6556, 6557, 6558, 6559, 6560, 6561, 6562, 6563, 6564, 6565, 6566, 6567, 6568, 6569, 6570, 6571, 6572, 6573, 6574, 6575, 6576, 6577, 6578, 6579, 6580, 6581, 6582, 6583, 6584, 6585, 6586, 6587, 6588, 6589, 6590, 6591, 6592, 6593, 6594, 6595, 6596, 6597, 6598, 6599, 6600, 6601, 6602, 6603, 6604, 6605, 6606, 6607, 6608, 6609, 6610, 6611, 6612, 6613, 6614, 6615, 6616, 6617, 6618, 6619, 6620, 6621, 6622, 6623, 6624, 6625, 6626, 6627, 6628, 6629, 6630, 6631, 6632, 6633, 6634, 6635, 6636, 6637, 6638, 6639, 6640, 6641, 6642, 6643, 6644, 6645, 6646, 6647, 6648, 6649, 6650, 6651, 6652, 6653, 6654, 6655, 6656, 6657, 6658, 6659, 6660, 6661, 6662, 6663, 6664, 6665, 6666, 6667, 6668, 6669, 6670, 6671, 6672, 6673, 6674, 6675, 6676, 6677, 6678, 6679, 6680, 6681, 6682, 6683, 6684, 6685, 6686, 6687, 6688, 6689, 6690, 6691, 6692, 6693, 6694, 6695, 6696, 6697, 6698, 6699, 6700, 6701, 6702, 6703, 6704, 6705, 6706, 6707, 6708, 6709, 6710, 6711, 6712, 6713, 6714, 6715, 6716, 6717, 6718, 6719, 6720, 6721, 6722, 6723, 6724, 6725, 6726, 6727, 6728, 6729, 6730, 6731, 6732, 6733, 6734, 6735, 6736, 6737, 6738, 6739, 6740, 6741, 6742, 6743, 6744, 6745, 6746, 6747, 6748, 6749, 6750, 6751, 6752, 6753, 6754, 6755, 6756, 6757, 6758, 6759, 6760, 6761, 6762, 6763, 6764, 6765, 6766, 6767, 6768, 6769, 6770, 6771, 6772, 6773, 6774, 6775, 6776, 6777, 6778, 6779, 6780, 6781, 6782, 6783, 6784, 6785, 6786, 6787, 6788, 6789, 6790, 6791, 6792, 6793, 6794, 6795, 6796, 6797, 6798, 6799, 6800, 6801, 6802, 6803, 6804, 6805, 6806, 6807, 6808, 6809, 6810, 6811, 6812, 6813, 6814, 6815, 6816, 6817, 6818, 6819, 6820, 6821, 6822, 6823, 6824, 6825, 6826, 6827, 6828, 6829, 6830, 6831, 6832, 6833, 6834, 6835, 6836, 6837, 6838, 6839, 6840, 6841, 6842, 6843, 6844, 6845, 6846, 6847, 6848, 6849, 6850, 6851, 6852, 6853, 6854, 6855, 6856, 6857, 6858, 6859, 6860, 6861, 6862, 6863, 6864, 6865, 6866, 6867, 6868, 6869, 6870, 6871, 6872, 6873, 6874, 6875, 6876, 6877, 6878, 6879, 6880, 6881, 6882, 6883, 6884, 6885, 6886, 6887, 6888, 6889, 6890, 6891, 6892, 6893, 6894, 6895, 6896, 6897, 6898, 6899, 6900, 6901, 6902, 6903, 6904, 6905, 6906, 6907, 6908, 6909, 6910, 6911, 6912, 6913, 6914, 6915, 6916, 6917, 6918, 6919, 6920, 6921, 6922, 6923, 6924, 6925, 6926, 6927, 6928, 6929, 6930, 6931, 6932, 6933, 6934, 6935, 6936, 6937, 6938, 6939, 6940, 6941, 6942, 6943, 6944, 6945, 6946, 6947, 6948, 6949, 6950, 6951, 6952, 6953, 6954, 6955, 6956, 6957, 6958, 6959, 6960, 6961, 6962, 6963, 6964, 6965, 6966, 6967, 6968, 6969, 6970, 6971, 6972, 6973, 6974, 6975, 6976, 6977, 6978, 6979, 6980, 6981, 6982, 6983, 6984, 6985, 6986, 6987, 6988, 6989, 6990, 6991, 6992, 6993, 6994, 6995, 6996, 6997, 6998, 6999, 7000, 7001, 7002, 7003, 7004, 7005, 7006, 7007, 7008, 7009, 7010, 7011, 7012, 7013, 7014, 7015, 7016, 7017, 7018, 7019, 7020, 7021, 7022, 7023, 7024, 7025, 7026, 7027, 7028, 7029, 7030, 7031, 7032, 7033, 7034, 7035, 7036, 7037, 7038, 7039, 7040, 7041, 7042, 7043, 7044, 7045, 7046, 7047, 7048, 7049, 7050, 7051, 7052, 7053, 7054, 7055, 7056, 7057, 7058, 7059, 7060, 7061, 7062, 7063, 7064, 7065, 7066, 7067, 7068, 7069, 7070, 7071, 7072, 7073, 7074, 7075, 7076, 7077, 7078, 7079, 7080, 7081, 7082, 7083, 7084, 7085, 7086, 7087, 7088, 7089, 7090, 7091, 7092, 7093, 7094, 7095, 7096, 7097, 7098, 7099, 7100, 7101, 7102, 7103, 7104, 7105, 7106, 7107, 7108, 7109, 7110, 7111, 7112, 7113, 7114, 7115, 7116, 7117, 7118, 7119, 7120, 7121, 7122, 7123, 7124, 7125, 7126, 7127, 7128, 7129, 7130, 7131, 7132, 7133, 7134, 7135, 7136, 7137, 7138, 7139, 7140, 7141, 7142, 7143, 7144, 7145, 7146, 7147, 7148, 7149, 7150, 7151, 7152, 7153, 7154, 7155, 7156, 7157, 7158, 7159, 7160, 7161, 7162, 7163, 7164, 7165, 7166, 7167, 7168, 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7180, 7181, 7182, 7183, 7184, 7185, 7186, 7187, 7188, 7189, 7190, 7191, 7192, 7193, 7194, 7195, 7196, 7197, 7198, 7199, 7200, 7201, 7202, 7203, 7204, 7205, 7206, 7207, 7208, 7209, 7210, 7211, 7212, 7213, 7214, 7215, 7216, 7217, 7218, 7219, 7220, 7221, 7222, 7223, 7224, 7225, 7226, 7227, 7228, 7229, 7230, 7231, 7232, 7233, 7234, 7235, 7236, 7237, 7238, 7239, 7240, 7241, 7242, 7243, 7244, 7245, 7246, 7247, 7248, 7249, 7250, 7251, 7252, 7253, 7254, 7255, 7256, 7257, 7258, 7259, 7260, 7261, 7262, 7263, 7264, 7265, 7266, 7267, 7268, 7269, 7270, 7271, 7272, 7273, 7274, 7275, 7276, 7277, 7278, 7279, 7280, 7281, 7282, 7283, 7284, 7285, 7286, 7287, 7288, 7289, 7290, 7291, 7292, 7293, 7294, 7295, 7296, 7297, 7298, 7299, 7300, 7301, 7302, 7303, 7304, 7305, 7306, 7307, 7308, 7309, 7310, 7311, 7312, 7313, 7314, 7315, 7316, 7317, 7318, 7319, 7320, 7321, 7322, 7323, 7324, 7325, 7326, 7327, 7328, 7329, 7330, 7331, 7332, 7333, 7334, 7335, 7336, 7337, 7338, 7339, 7340, 7341, 7342, 7343, 7344, 7345, 7346, 7347, 7348, 7349, 7350, 7351, 7352, 7353, 7354, 7355, 7356, 7357, 7358, 7359, 7360, 7361, 7362, 7363, 7364, 7365, 7366, 7367, 7368, 7369, 7370, 7371, 7372, 7373, 7374, 7375, 7376, 7377, 7378, 7379, 7380, 7381, 7382, 7383, 7384, 7385, 7386, 7387, 7388, 7389, 7390, 7391, 7392, 7393, 7394, 7395, 7396, 7397, 7398, 7399, 7400, 7401, 7402, 7403, 7404, 7405, 7406, 7407, 7408, 7409, 7410, 7411, 7412, 7413, 7414, 7415, 7416, 7417, 7418, 7419, 7420, 7421, 7422, 7423, 7424, 7425, 7426, 7427, 7428, 7429, 7430, 7431, 7432, 7433, 7434, 7435, 7436, 7437, 7438, 7439, 7440, 7441, 7442, 7443, 7444, 7445, 7446, 7447, 7448, 7449, 7450, 7451, 7452, 7453, 7454, 7455, 7456, 7457, 7458, 7459, 7460, 7461, 7462, 7463, 7464, 7465, 7466, 7467, 7468, 7469, 7470, 7471, 7472, 7473, 7474, 7475, 7476, 7477, 7478, 7479, 7480, 7481, 7482, 7483, 7484, 7485, 7486, 7487, 7488, 7489, 7490, 7491, 7492, 7493, 7494, 7495, 7496, 7497, 7498, 7499, 7500, 7501, 7502, 7503, 7504, 7505, 7506, 7507, 7508, 7509, 7510, 7511, 7512, 7513, 7514, 7515, 7516, 7517, 7518, 7519, 7520, 7521, 7522, 7523, 7524, 7525, 7526, 7527, 7528, 7529, 7530, 7531, 7532, 7533, 7534, 7535, 7536, 7537, 7538, 7539, 7540, 7541, 7542, 7543, 7544, 7545, 7546, 7547, 7548, 7549, 7550, 7551, 7552, 7553, 7554, 7555, 7556, 7557, 7558, 7559, 7560, 7561, 7562, 7563, 7564, 7565, 7566, 7567, 7568, 7569, 7570, 7571, 7572, 7573, 7574, 7575, 7576, 7577, 7578, 7579, 7580, 7581, 7582, 7583, 7584, 7585, 7586, 7587, 7588, 7589, 7590, 7591, 7592, 7593, 7594, 7595, 7596, 7597, 7598, 7599, 7600, 7601, 7602, 7603, 7604, 7605, 7606, 7607, 7608, 7609, 7610, 7611, 7612, 7613, 7614, 7615, 7616, 7617, 7618, 7619, 7620, 7621, 7622, 7623, 7624, 7625, 7626, 7627, 7628, 7629, 7630, 7631, 7632, 7633, 7634, 7635, 7636, 7637, 7638, 7639, 7640, 7641, 7642, 7643, 7644, 7645, 7646, 7647, 7648, 7649, 7650, 7651, 7652, 7653, 7654, 7655, 7656, 7657, 7658, 7659, 7660, 7661, 7662, 7663, 7664, 7665, 7666, 7667, 7668, 7669, 7670, 7671, 7672, 7673, 7674, 7675, 7676, 7677, 7678, 7679, 7680, 7681, 7682, 7683, 7684, 7685, 7686, 7687, 7688, 7689, 7690, 7691, 7692, 7693, 7694, 7695, 7696, 7697, 7698, 7699, 7700, 7701, 7702, 7703, 7704, 7705, 7706, 7707, 7708, 7709, 7710, 7711, 7712, 7713, 7714, 7715, 7716, 7717, 7718, 7719, 7720, 7721, 7722, 7723, 7724, 7725, 7726, 7727, 7728, 7729, 7730, 7731, 7732, 7733, 7734, 7735, 7736, 7737, 7738, 7739, 7740, 7741, 7742, 7743, 7744, 7745, 7746, 7747, 7748, 7749, 7750, 7751, 7752, 7753, 7754, 7755, 7756, 7757, 7758, 7759, 7760, 7761, 7762, 7763, 7764, 7765, 7766, 7767, 7768, 7769, 7770, 7771, 7772, 7773, 7774, 7775, 7776, 7777, 7778, 7779, 7780, 7781, 7782, 7783, 7784, 7785, 7786, 7787, 7788, 7789, 7790, 7791, 7792, 7793, 7794, 7795, 7796, 7797, 7798, 7799, 7800, 7801, 7802, 7803, 7804, 7805, 7806, 7807, 7808, 7809, 7810, 7811, 7812, 7813, 7814, 7815, 7816, 7817, 7818, 7819, 7820, 7821, 7822, 7823, 7824, 7825, 7826, 7827, 7828, 7829, 7830, 7831, 7832, 7833, 7834, 7835, 7836, 7837, 7838, 7839, 7840, 7841, 7842, 7843, 7844, 7845, 7846, 7847, 7848, 7849, 7850, 7851, 7852, 7853, 7854, 7855, 7856, 7857, 7858, 7859, 7860, 7861, 7862, 7863, 7864, 7865, 7866, 7867, 7868, 7869, 7870, 7871, 7872, 7873, 7874, 7875, 7876, 7877, 7878, 7879, 7880, 7881, 7882, 7883, 7884, 7885, 7886, 7887, 7888, 7889, 7890, 7891, 7892, 7893, 7894, 7895, 7896, 7897, 7898, 7899, 7900, 7901, 7902, 7903, 7904, 7905, 7906, 7907, 7908, 7909, 7910, 7911, 7912, 7913, 7914, 7915, 7916, 7917, 7918, 7919, 7920, 7921, 7922, 7923, 7924, 7925, 7926, 7927, 7928, 7929, 7930, 7931, 7932, 7933, 7934, 7935, 7936, 7937, 7938, 7939, 7940, 7941, 7942, 7943, 7944, 7945, 7946, 7947, 7948, 7949, 7950, 7951, 7952, 7953, 7954, 7955, 7956, 7957, 7958, 7959, 7960, 7961, 7962, 7963, 7964, 7965, 7966, 7967, 7968, 7969, 7970, 7971, 7972, 7973, 7974, 7975, 7976, 7977, 7978, 7979, 7980, 7981, 7982, 7983, 7984, 7985, 7986, 7987, 7988, 7989, 7990, 7991, 7992, 7993, 7994, 7995, 7996, 7997, 7998, 7999, 8000, 8001, 8002, 8003, 8004, 8005, 8006, 8007, 8008, 8009, 8010, 8011, 8012, 8013, 8014, 8015, 8016, 8017, 8018, 8019, 8020, 8021, 8022, 8023, 8024, 8025, 8026, 8027, 8028, 8029, 8030, 8031, 8032, 8033, 8034, 8035, 8036, 8037, 8038, 8039, 8040, 8041, 8042, 8043, 8044, 8045, 8046, 8047, 8048, 8049, 8050, 8051, 8052, 8053, 8054, 8055, 8056, 8057, 8058, 8059, 8060, 8061, 8062, 8063, 8064, 8065, 8066, 8067, 8068, 8069, 8070, 8071, 8072, 8073, 8074, 8075, 8076, 8077, 8078, 8079, 8080, 8081, 8082, 8083, 8084, 8085, 8086, 8087, 8088, 8089, 8090, 8091, 8092, 8093, 8094, 8095, 8096, 8097, 8098, 8099, 8100, 8101, 8102, 8103, 8104, 8105, 8106, 8107, 8108, 8109, 8110, 8111, 8112, 8113, 8114, 8115, 8116, 8117, 8118, 8119, 8120, 8121, 8122, 8123, 8124, 8125, 8126, 8127, 8128, 8129, 8130, 8131, 8132, 8133, 8134, 8135, 8136, 8137, 8138, 8139, 8140, 8141, 8142, 8143, 8144, 8145, 8146, 8147, 8148, 8149, 8150, 8151, 8152, 8153, 8154, 8155, 8156, 8157, 8158, 8159, 8160, 8161, 8162, 8163, 8164, 8165, 8166, 8167, 8168, 8169, 8170, 8171, 8172, 8173, 8174, 8175, 8176, 8177, 8178, 8179, 8180, 8181, 8182, 8183, 8184, 8185, 8186, 8187, 8188, 8189, 8190, 8191, 8192, 8193, 8194, 8195, 8196, 8197, 8198, 8199, 8200, 8201, 8202, 8203, 8204, 8205, 8206, 8207, 8208, 8209, 8210, 8211, 8212, 8213, 8214, 8215, 8216, 8217, 8218, 8219, 8220, 8221, 8222, 8223, 8224, 8225, 8226, 8227, 8228, 8229, 8230, 8231, 8232, 8233, 8234, 8235, 8236, 8237, 8238, 8239, 8240, 8241, 8242, 8243, 8244, 8245, 8246, 8247, 8248, 8249, 8250, 8251, 8252, 8253, 8254, 8255, 8256, 8257, 8258, 8259, 8260, 8261, 8262, 8263, 8264, 8265, 8266, 8267, 8268, 8269, 8270, 8271, 8272, 8273, 8274, 8275, 8276, 8277, 8278, 8279, 8280, 8281, 8282, 8283, 8284, 8285, 8286, 8287, 8288, 8289, 8290, 8291, 8292, 8293, 8294, 8295, 8296, 8297, 8298, 8299, 8300, 8301, 8302, 8303, 8304, 8305, 8306, 8307, 8308, 8309, 8310, 8311, 8312, 8313, 8314, 8315, 8316, 8317, 8318, 8319, 8320, 8321, 8322, 8323, 8324, 8325, 8326, 8327, 8328, 8329, 8330, 8331, 8332, 8333, 8334, 8335, 8336, 8337, 8338, 8339, 8340, 8341, 8342, 8343, 8344, 8345, 8346, 8347, 8348, 8349, 8350, 8351, 8352, 8353, 8354, 8355, 8356, 8357, 8358, 8359, 8360, 8361, 8362, 8363, 8364, 8365, 8366, 8367, 8368, 8369, 8370, 8371, 8372, 8373, 8374, 8375, 8376, 8377, 8378, 8379, 8380, 8381, 8382, 8383, 8384, 8385, 8386, 8387, 8388, 8389, 8390, 8391, 8392, 8393, 8394, 8395, 8396, 8397, 8398, 8399, 8400, 8401, 8402, 8403, 8404, 8405, 8406, 8407, 8408, 8409, 8410, 8411, 8412, 8413, 8414, 8415, 8416, 8417, 8418, 8419, 8420, 8421, 8422, 8423, 8424, 8425, 8426, 8427, 8428, 8429, 8430, 8431, 8432, 8433, 8434, 8435, 8436, 8437, 8438, 8439, 8440, 8441, 8442, 8443, 8444, 8445, 8446, 8447, 8448, 8449, 8450, 8451, 8452, 8453, 8454, 8455, 8456, 8457, 8458, 8459, 8460, 8461, 8462, 8463, 8464, 8465, 8466, 8467, 8

DCC Dallas County Correctional Center

Date: 06/12/2008

GRIEVANCE

OFFENDER INFORMATION

Offender Name : LEWIS, JIMMY SBI : 6622 Institution : DCC
 Grievance # : 160192 Grievance Date : 4/2008 Category : Individual
 Status : Withdrawn Resol. Date :
 Grievance Type: Health Issue (Medical) Incident Time :
 IGC : Dutton, Matthew 17, Upper, Tier C, Cell 11, Single

OFFENSE INFORMATION

Description of Complaint: Inmate Claims: On 5/1/08, I received a package that contained a gas mask and to gasp for oxygen. I then felt a sharp pain in my chest, and my eyes to a point where I was unable to see. I was subsequently admitted into the DCC infirmary due to my condition. The medical staff ordered a CMP order for my blood work, for my tissue my hair and blood. The results of the blood work were not provided to me, which was drawn on 5/1/08.

Remedy Requested : To be provided with the results of the CMP blood results from Bioreferene labs, to ensure that my rights aren't violated see also, CA no. 06-778, D.R. #1041107.

INDIVIDUALS INVOLVED

Type	SBI #

ADDITIONAL INFORMATION

Medical Grievance : YES

Investigation Sent : 06/03/2008

Grievance Amount :

Escal Unit : 06/03/2008

: Moore, Ronnie

ReedSmith

J. Cory Falgowski, Esq.
Direct Phone: +1 302 778 7522
Email: jfalgowski@reedsmith.com

Reed Smith LLP
1201 Market Street
Suite 1500
Wilmington, DE 19801-1163
+1 302 778 7500
Fax +1 302 778 7575
reedsmith.com

June 3, 2008

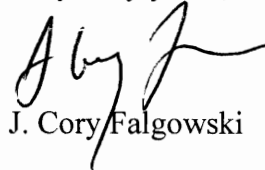
Jimmie Lewis
SBI#506622
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

Civil Case Nos. 05-13 (GMS) and 06-778 (GMS)

Dear Mr. Lewis:

Ms. Jackson and I have received your letter dated May 24, 2008. We have arranged an initial conference with you at the D.C.C. on Tuesday, June 24, 2008. If you will be unavailable to meet on that date for any reason, please let us know. In the meantime, per your request, enclosed please find updated docket sheets for the above-referenced civil actions. Also enclosed is a copy of Chief Judge Sleet's Memorandum Order denying the motion for a preliminary injunction. We will discuss these matters in detail during our initial conference. We look forward to speaking with you on June 24th.

Very truly yours,



J. Cory Falgowski

JCF:dkk
Enclosures
cc: Katharine V. Jackson, Esq.

Jimmie Lewis
I/M: 506622 UNIT 5H17, C111
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST. LOCKBOX 18
WILMINGTON, DELAWARE
19801

